UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 03 MDL 1570 (GBD) (SN)

This document relates to:

Ashton, et al. v. Islamic Republic of Iran, No. 02-cv-6977 (GBD) (SN) Bauer, et al. v. v. Islamic Republic of Iran, No. 02-7236 (GBD) (SN)

NOTICE OF MOTION TO CORRECT

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned matters who are represented by Baumeister & Samuels, P.C., by undersigned counsel and in accordance with Fed. R. Civ. P. 60(a), respectfully request that this Court grant Plaintiffs' Motion to Correct Exhibits A and C-1 to the Declaration of Dorothea M. Capone, Esq., and the Proposed Final Judgment filed July 29, 2002 at ECF Nos. 8299-1, 8299-3, 8300-1, and 8300-3, 02-cv-6977, ECF Nos. 1702-1, 1702-3, 1703-1 and 1703-3, 02-cv-7236, ECF Nos. 168-1, 168-3, 169-1, and 169-3 to correct clerical and/or typographical errors. No adverse parties have appeared in this proceeding, and the Clerk issued Certificates of Default on May 12, 2006. In support of this motion, Plaintiffs submit the Declaration of Dorothea M. Capone, Esq. with corrected exhibits, and Proposed Order with corrected exhibits.

Dated: New York, New York August 16, 2022

Respectfully submitted,

BAUMEISTER & SAMUELS, P.C.

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¹ References to MDL docket entries found at 03-md-1570 (S.D.N.Y.) are noted only by ECF number and references to individual civil case docket entries are preceded by the case number.